

ORIGINAL

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MEMO ENDORSED

March 20, 2020

VIA ECF

The Honorable Louis L. Stanton
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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Re: FPM – Florida Property Management LLC v. Eric S. Brown, et al.
Docket No.: 19 Civ. 07129 (LLS)

Dear Judge Stanton:

This office represents Plaintiff, FPM – Florida Property Management LLC, in the above referenced matter. For the reasons set forth below, I respectfully request an adjournment of the discovery deadline dates contained in Your Honor's Scheduling Order dated January 30, 2019.

Since the January 30, 2020 scheduling conference, the Parties have been working together to finalize a settlement, however, at this time we still do not have a final settlement. Settlement was delayed, in part, because attorney Michael Macklowitz had a death in his family and was not able to continue negotiations. Additionally, I was quarantined for 2 weeks due to the Corona virus beginning February 22, 2020.

Based upon the above, I respectfully propose the following revised discovery schedule and conference date, should it please the court:

- Defendants will serve a copy of their insurance agreements, as provided in Fed. R. Civ. P. 26(a)(1)(A)(iv), by April 21, 2020.
- The parties will serve all other required initial disclosures, as provided in Fed. R. Civ. P. 26(a)(1)(A)(i)-(iii), by April 21, 2020.
- The parties will serve initial requests for production of documents by April 27, 2020. Copies of the requested documents and written responses will be served by June 8, 2020.
- The parties will serve initial interrogatories by April 27, 2020.
- All depositions to be completed on or before July 20, 2020.
- Status Conference Thursday August 27, 2020. *at 12 noon* *lvs*

All of the above dates are subject to any further restrictions imposed by the federal, state or city government. **I consulted with attorneys Michael Macklowitz, Esq. and Allen Frankel, Esq. and the above dates are on consent of all parties.**

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Ordered
Louis L.
Stanton
3/23/20

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We thank the Court for its consideration and attention to this matter. Stay safe and healthy.

Respectfully submitted,

-s-

Paul S. Zilberfein, Esq.

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Allen Frankel, Esq. [allencfrankel@mac.com]